

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, HANNAH
PEARCE, MARCUS MARTIN, NATALIE
ROMERO, CHELSEA ALVARADO, and
JOHN DOE,

Plaintiffs,

Civil Action No. 3:17-cv-00072-NKM

v.

JASON KESSLER, et al.,

Defendants.

**PLAINTIFFS' MOTION TO SEAL EXHIBIT TO PLAINTIFFS' MOTION SEEKING
LEAVE TO DEPOSE THOMAS RYAN ROUSSEAU AS AN AUTHORIZED
REPRESENTATIVE OF VANGUARD AMERICA**

On September 5, 2019, Plaintiffs filed a Motion Seeking Leave to Depose Thomas Ryan Rousseau as an Authorized Representative of Vanguard America. For the reasons set forth below, Plaintiffs respectfully request that the Court enter the proposed order sealing Exhibit 1 to Plaintiffs' Motion, which were submitted conditionally under seal today in this matter.

Exhibit 1 to Plaintiffs' Motion was designated as Confidential by Plaintiffs pursuant to the Order for the Production of Documents and Exchange of Confidential Information on January 3, 2018 (ECF No. 167, the "Protective Order"). Additionally, Exhibit 1 contains Confidential information as defined by the terms of the Protective Order. For the reasons set forth herein, Plaintiffs request that Exhibit 1 to Plaintiffs' Motion be sealed in accordance with Local Rule 9.

Dated: September 5, 2019

Respectfully submitted,

/s/ Alan Levine

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CERTIFICATE OF SERVICE

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I further hereby certify that on September 5, 2019, I also served the following non-ECF participants, via electronic mail, as follows:

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